UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

21-93 JRT/TNL

Plaintiff,

INDICTMENT

٧.

21 U.S.C. § 841(a)(1) 21 U.S.C. § 841(b)(1)(A) 21 U.S.C. § 853

ROBBIN ALLEN THOMAS,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Possession with Intent To Distribute a Controlled Substance)

On or about February 19, 2021, in the State and District of Minnesota, the defendant,

ROBBIN ALLEN THOMAS,

did knowingly and intentionally possess with intent to distribute a controlled substance, specifically, 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

FORFEITURE ALLEGATIONS

Count 1 of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

If convicted of Count 1, the defendant shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and

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any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of that offense, including but not limited to a Bersa BP9CC nine millimeter handgun (serial # E58801) seized from the defendant's vehicle on or about February 19, 2021.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

A TRUE BILL

ACTING UNITED STATES ATTORNEY FOREPERSON